

M. Brett et al.
U.S. Serial No. 09/914,664
Page 4 of 6

REMARKS

Applicants appreciate the notification of allowable subject matter, i.e., that claims 11, 17, and 18 are objected to as being dependent upon a rejected basic claim, but would be allowable if rewritten in independent form.

Claims 10-18 are pending in the application. Claims 10 and 11 have been amended by the present amendment. The amendments are fully supported by the application as originally filed.

Applicants' claimed invention relates to a method for picture insertion into video pictures (picture-in-picture insertion, or "PIP"), where a smaller inset picture is inserted into a larger main picture. For picture-in-picture insertion, the smaller picture is displayed synchronously with the larger main picture at a predetermined location on a display device, and the synchronization between the smaller inset picture and the larger main picture is effected using vertical and horizontal synchronizing signals.

As recited in claim 10, to insert the inset picture (EB) into the main picture (HB), the following steps are required: first, the time duration between two successive horizontal start pulses is determined to determine an actual line duration (TZD) of a complete line of the main picture HB (see FIGS. 1A and 1B). Second, dependent on the time duration between the two successive horizontal start pulses (i.e., the actual line duration TZD of the main picture), and dependent on a desired vertical position of the inset picture EB within the main picture HB, a line of the inset picture is inserted within a provided line of the main picture after a specific number of pixels from the beginning of the line of the main picture IIB.

Dependent claim 11 defines how to calculate this specific number of pixels in dependence upon the actual line duration of a complete line of the main picture and the nominal line duration of a complete line of the main picture.

M. Brett et al.
U.S. Serial No. 09/914,664
Page 5 of 6

Claims 10 and 12-16 were rejected under 35 USC 103(a) as being unpatentable over European Publication No. 0 318 986 to "Suzuki" in view of Japanese Publication No. 10-013760 to "Ryuichi." This rejection is respectfully traversed.

The Suzuki and Ryuichi references, whether taken alone or in combination, do not teach or suggest inserting an inset picture into a main picture based on the time duration between two successive horizontal start pulses of the main picture to determine an *actual line duration* of a line of the main picture.

Applicants' arguments in the Amendment filed on June 2, 2004 are incorporated by reference herein.

In the "Response to Arguments" section of the Office Action of 08/09/2004, it was stated: "...the counter 116 of Suzuki et al is used to determine the time duration between two horizontal start pulses of a main picture in order to calculate the horizontal position of an inset picture with respect to a main picture based on the determined line duration" (page 2, 3rd paragraph).

However, on page 4 of the Office Action, it was noted: "However, Hiroyuki Suzuki et al explicitly do not disclose the claimed determining the time duration between two start pulses" (page 4, 2nd paragraph, emphasis added).

Regarding the "Response to Arguments" on page 2 of the Office Action, the cited passage (column 11, lines 49-52) merely proposes to count a particular number of horizontal synchronizing pulses in order to determine the position of an inset picture. Suzuki does not teach or suggest determining the time duration between two successive horizontal pulses, as recited in claim 10 (as amended). In particular, Suzuki does not disclose determining the time duration between two successive start pulses of a main picture in order to determine the actual line duration of a complete line of the main picture, which is then used as a basis for calculating the horizontal position of an inset picture in the main picture.

M. Brett et al.
U.S. Serial No. 09/914,664
Page 6 of 6

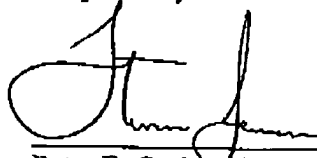
The Ryuichi reference was cited for teaching the determination of a time duration. However, Ryuichi merely discloses to detect a leading edge of a horizontal synchronizing pulse placed just before a reference signal, as well as the leading edge of the reference signal, so as to obtain a time duration between both leading edge signals (see Abstract, as cited in the Office Action).

Although Ryuichi discloses detecting a time duration between two horizontal signals, the signals are not "two successive horizontal start pulses", as recited in claim 10. Moreover, Ryuichi does not disclose calculating the actual line duration of a complete line of a main picture depending on the time duration determined between two successive horizontal start pulses, the actual line duration serving as a basis for calculating the horizontal position of the inset picture in the main picture.

Even if the teachings of Ryuichi were somehow incorporated into the system of Suzuki, one of ordinary skill in the art would not obtain the method of the Applicants' claimed invention, as the structure and function of the horizontal synchronizing signal in Suzuki and the reference signal in Ryuichi are incompatible, and completely different from the structure and function of the two successive horizontal start pulses recited in claim 10.

It is believed the application is in condition for immediate allowance, which action is earnestly solicited.

Respectfully submitted,



Peter F. Corless (Reg. No. 33,860)
Steven M. Jensen (Reg. No. 42,693)
EDWARDS & ANGELL, LLP
P.O. Box 55874
Boston, MA 02205

Date: November 9, 2004

Phone: (617) 439-4444

Customer No. 21874